

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AND RELATED COUNTERCLAIM

WHEREAS, Pentalpha has previously granted Reddy extensions of time to respond, to meet and confer and to provide amended responses;

Stipulation and Order For Discovery Responses
Pentalpha v. Reddy

1 NOW THEREFORE, the parties hereby stipulate as follows:

2 Pentalpha's First Set of Interrogatories:

3 No. 1: Reddy will provide further response to Interrogatory No. 1, which response shall
4 include at least the following: an identification of each specific piece of property allegedly
5 converted, the specific person that allegedly converted it, the specific date and time that it was
6 allegedly converted, the specific value of each piece of property that you contend was converted,
7 and a statement of all facts supporting your contentions listed above. The amended answer must
8 also include the detailed factual basis for contending that Pentalpha converted any specific item
9 of Reddy's property.

10 No. 2: Reddy will set forth all upon which he relies regarding his valuation of each
11 element of damages for each specific item of allegedly converted property, and a detailed
12 description of each document supporting his valuation.

13 No. 3: Reddy shall identify all persons who he alleges in his Third Amended
14 Counterclaim defamed him, including each individuals name, address, and position held at
15 Opsys or Pentalpha. For each individual so identified, Reddy shall state (1) the exact statement
16 made by each individual, (2) to whom the statement was said, (3) any other individuals who
17 heard the statement being uttered, (4) where the statement was said and (4) the date and time that
18 the allegedly defamatory statement was made. If Reddy contends that Pentalpha is responsible
19 for a statement made by an Opsys US employee or consultant, Reddy Shall state all the facts
20 upon which he relies for that contention.

21 No. 4: Reddy shall identify each alleged misrepresentation that he contends was made by
22 Pentalpha, and for each alleged misrepresentation include (a) the person making the statement,
23 (b) the specific date and time that the statement was allegedly made, (c) the exact words used,
24 (d) to whom the statement was allegedly made, (e) why the statement was false, (f) how Reddy
25 relied on the statement to his detriment, (g) all facts on which Reddy relies in contending that
26 Pentalpha knew that any statement was allegedly false and (h) the exact nature and amount of

1 damages that he attributes to the alleged misrepresentation.

2 No. 5: Reddy shall identify each act by Pentalpha that he contends caused emotional
3 distress as alleged in the Fifth Cause of Action in his Third Amended Counterclaim, including
4 without limitation, (a) who allegedly performed the act, (b) all witnesses to the act, (c)
5 identification of all documents supporting his claim of emotional distress, (d) the amount and
6 nature of damages that he attributes to each act allegedly done by Pentalpha. Reddy shall also
7 state all facts upon which Reddy relies in contending that he suffered emotional distress
8 damages, identify the categories of documents supporting his contention, and any witnesses with
9 knowledge of the nature and extent of his alleged emotional distress damages.

10 No. 9: Reddy shall provide specific and detailed facts regarding what he contends is the
11 corporate relationship between Opsys US's parent company and Pentalpha.

12 Reddy shall provide all amended and supplemental interrogatory responses by 5:00 PM
13 on Friday, June 24, 2005 by fax.

14 First Set of Document Requests:

15 Reddy shall review each of the document requests and shall make a diligent and thorough
16 search of those documents in his possession, custody and/or control for all documents responsive
17 to the Requests and shall produce all such documents to Pentalpha's counsel on or before June
18 24, 2005 at 224 Birmingham Drive, Suite 1A4, Cardiff, CA. Without limiting the foregoing, at a
19 minimum, Reddy shall produce all documents supporting his claims against Pentalpha, including
20 his conversion claim, all documents showing his lending money to Opsys US and receiving
21 repayment by Opsys US, all support that Reddy has that would show that he had contacts with
22 any bona fide investor on behalf of Opsys US, and all documents evidencing his damages,
23 including emotional distress.

24 First Set of Requests for Admission:

25 Reddy and his counsel shall review each of the Requests for Admission and shall
26 determine in good faith and pursuant to Fed. R. Civ. P. 26(g) whether each Request for
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1 Admission should be admitted or denied.

2 Reddy shall provide all amended Admissions by 5:00 PM on Friday, June 24, 2005 by
3 fax.

4 Respectfully Submitted,

5 FLYNN & STILLMAN

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7 Dated: June 20, 2005

8 By: _____
Philip H. Stillman, Esq.
Attorneys for Plaintiff and counter-defendant
9 PENTALPHA MACAU COMMERCIAL
OFFSHORE LIMITED

10 LAW OFFICES OF STANLEY HILTON

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12 Dated: June 20, 2005

13 By: _____
/s/ Stanley G. Hilton
Stanley G. Hilton, Esq.
Attorneys for defendant and counterclaimant,
14 DAMODER REDDY

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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18 Dated: June 24, 2005

19 /s/ Maxine M. Chesney
Hon. Maxine M. Chesney
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